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## REMARKS

### I. Status Summary

Claims 1-5, 7-28, 30-35, and 37-49 are pending in the present application. Claims 1-5, 7-28, 30-35, and 37-49 presently stand rejected. By this amendment, claims 1, 23, 30, 37, and 46-49 have been amended and new claims 50-51 have been added.

### II. Claim Rejections – 35 U.S.C. § 103

Claims 1-5, 7-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 5,036,984 to Labarthe in view of U.S. Patent No. 6,168,080 to Verschuur.

Claims 16-18 and 39-41 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 6,073,060 to Robinson.

Claims 19, 22, 42, and 45 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent No. 4,858,907 to Eisener et al.

Claims 30-35 presently stand rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over Labarthe and Verschuur in view of U.S. Patent Application Serial No. 2001/0032881 to Wells et al.

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Applicant has carefully studied the Examiner's comments and contentions set forth in the Official Action and respectfully submits that the presently claimed subject matter is not rendered obvious by any combination of the cited references. The Examiner's rejections based on 35 U.S.C. § 103(a) are respectfully traversed as discussed below.

A. Labarthe in view of Verschuur

(i) Examiner's Argument

Claims 1-5, 7-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe in view of Verschuur. The Examiner has maintained the rejections based on Labarthe in view of Verschuur as set forth in the first and second Official Actions and has added the following additional contentions.

With respect to Labarthe, the Examiner states that Labarthe, in Figure 1 and column 8, line 63 to column 9, line 5, teaches ensuring that envelopes are correctly processed to avoid mistakes that would not allow checks to be processed through the clearing organizations based on the indicia located on the check's envelope. The Examiner also contends that Labarthe discloses optical recognition of addresses on the outside of an envelope as well as through the envelope's window (referring to at least column 7, lines 61-67). Moreover, the Examiner states that Labarthe discloses updating payee's address information, essentially disclosing an account that stores payee

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address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file.

With respect to Verschuur, the Examiner states that Verschuur, in at least column 3, lines 6-29, discloses reading the encoded information contained within an envelope to ensure it is being sent to the proper recipient, as well as identifying the intended recipient to print the proper address onto the exterior of the envelope, therefore indicating a comparison step according to the Examiner. The Examiner also contends that Verschuur discloses a comparison step in at least column 8, lines 19-27. The Examiner therefore reasons that it would be a simple and functionally equivalent step to compare a printed address with a stored address to ensure proper delivery of a mailpiece.

With regard to the assertion that Labarthe merely teaches the use of a first optical reader for reading data on the outside of an envelope and does not disclose a second reading device for reading data on inserted documents, the Examiner contends that Labarthe does teach a second optical reading device, referring to at least column 7, lines 30-36 and lines 63-67. The Examiner acknowledges though that Labarthe does not specifically disclose a second reading device that reads the document contained within the envelope. The Examiner contends, however, that Verschuur discloses a system that scans the exterior of envelopes and compares address information searching for a mismatch along with a system which scans the interior contents of an envelope to detect variations in the capacitance of a specialized conductive ink contained

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on the document within the envelope. The Examiner further contends that optical readers also use transducers to change optical energy to electrical energy, making the systems of Labarthe and Verschuur functionally equivalent in their intent and outcome.

With regard to the argument that Labarthe and Verschuur fail to teach or suggest providing a data file to access account information, the Examiner contends that Labarthe discloses updating payee's address information and as such discloses an account that stores payee address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file.

Applicant respectfully traverses the rejections based upon Labarthe and Verschuur as discussed below.

(ii) Response To Examiner's Argument

Labarthe discloses a method for enabling, without first opening the envelope, prioritized processing of envelopes according to an indication of clearing organizations of potentially enclosed checks. The method uses a payee address to convey information that encodes indicia of the clearing organization utilized by the drawer's payor bank. The address information is supplied in a manner so that the encoded indicia are readable from the unopened envelope. The envelopes are sorted unopened according to the encoded indicia after being read by an automatic reader such as an optical address reader, bar code reader, or combination thereof. After reading and

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sorting, the envelopes can be selectively processed in a manner determined by the encoded indicia of the clearing organization.

Labarthe merely teaches the use of a first optical reader for reading address data on the outside of an envelope or for reading address data readable through an envelope window. As the Examiner acknowledges, Labarthe does not disclose a second reading device for reading data on inserted documents (in addition to the first reading device). The Examiner states that Labarthe discloses updating payee's address information and therefore essentially discloses an account that stores payee address information that can be accessed and checked to ensure that a match exists between the indicia on the envelope and the account on file. Applicant respectfully submits that this updating of the payee address information is merely for the purpose of verifying the sort order of the checks received according to clearing organization used by a particular payee and is wholly unrelated to comparing acquired package data (separate and apart from address data) and acquired document data with account information located in an external data file in order to further process the package.

Verschuur discloses a system for acquiring encoded information from the contents of sealed envelopes or other layered structures that conceal the information from view. Verschuur is directed to outgoing mail that is subject to sorting and other processing errors that are difficult to detect, because once sealed, the contents are concealed from view. Verschuur teaches

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accomplishing this information acquisition by means of a transducer that measures changes in capacitance of a localized region beneath the surface of the envelope, such as can be produced by conductive inks or inks with a dielectric constant different from the paper upon which it is printed. The information obtained by the capacitance measurements can be used to affect further processing of the envelopes or other layered structures, such as comparing the obtained content information with address information optically read from the envelope to verify a match.

The envelope content detector of Verschuur requires the use of a transducer or parallel plate capacitors that are connected to an amplifier whose output is then examined by a computer. Document information within the envelope is printed using either conductive ink or dielectric ink using conventional bar-code or other conventional symbols that are interpretable in alphanumeric characters, and when either ink passes between the plates of the transducer, the capacitance changes. Since the apparatus of Verschuur is directed to acquiring information concealed from view, the transducer of Verschuur is directed solely to detection of conductive or dielectric ink that may be present on one or more documents inserted into an envelope. There is no teaching or suggestion of optical reading by the detector of Verschuur that detects the envelope content information and therefore alphanumeric information, such as addresses, account numbers, and the like, cannot be read directly from the document inserts. In fact, it is explicitly clear throughout the

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disclosure of Verschuur that the teachings are directed to reading hidden or concealed contents only (i.e., reading through envelopes independent of any wavelength of radiation, either for seeing through or detecting emission from the surface of an envelope). See Verschuur column 1, lines 11-13; column 2, lines 6-10 and line 62; and column 8, lines 57-63.

Additionally, Verschuur makes a direct comparison between information obtained from the envelope and information obtained from the contents (such as an address - address comparison) to verify if they match and to discontinue processing of the envelopes upon detection of a mismatch (see column 3, lines 19-29 and column 8, lines 19-26). There is no teaching or suggestion in Verschuur to use package data separate and apart from address data, or to utilize a data file containing account information, a portion of which corresponds to the package and document data.

The present application teaches verification of matching associations between information or data printed on a closed face package (package data) and material and/or information contained inside, but viewable through, the closed face package (document data). The package data pertains to account information and is distinct from address data that can also be additionally present and printed on the package. The document data printed on an inserted document pertains to the material and/or information contained inside the closed face package. In order to better clarify and more particularly point out

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various patentable subject matter, independent claims 1, 23, 30, 37, and 46-49 have been amended as set forth above and described in detail below.

Independent claim 1 is directed to a method for verifying a correct association between information printed on a closed face package and material and/or information contained within the package. The package has a window permitting a portion of a document inserted within the package to be read optically from a location outside of the package. As presently amended, a data file provided includes account information stored therein, the data file corresponding to printed package data on the package, the data file further corresponding to printed document data on the inserted document which pertains to material and/or information contained inside the closed face package, and the data file further corresponding to address data printed on the package. Claim 1 also recites a first reading device to optically read the printed package data on the package and a second reading device to optically read printed document data on the inserted document and appearing through the window in the package. These first and second readers therefore utilize optical reading of the package and inserted document (e.g., unconcealed data) and are designed for reading of the package data, that is distinct from the address data, and document data. Claim 1 further recites reading of the data file to access the account information stored therein and comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to



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determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. It is additionally noted that the present subject matter does not contemplate using the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 1. Specifically, and further to the distinctions highlighted in the previously filed Amendments A and B, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, first and second reading devices that optically read printed package data on the package, that is distinct from the address data, and document data on the inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a data file to access account information stored therein, the data file corresponding to the package data, the document data, and address data; reading of the data file to access the account information stored therein; or comparing at least a portion of the accessed account information with the

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package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

The Examiner cites column 7, lines 30-36 and lines 63-67 of Labarthe as disclosing using a second reading device to optically read printed document data on an inserted document and appearing through a window. Applicant respectfully submits that these two sections of Labarthe actually describe a first reader capable of reading a payee's address (either printed on the outside of the envelope or visible through an envelope window). In other words, there is no disclosure in Labarthe of optically reading package data that is distinct from address data and also reading insert document data for matching of the data with an external data file for envelope processing. Verschuur does disclose reading address data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), but a comparison of this information with identifying information acquired from the envelope contents would still require use of its transducer as described above rather than resulting from an optical reading. In fact, the entire disclosure of Verschuur is directed to the acquisition of concealed information from a sealed envelope (i.e., "reading through the envelope" technology) which is independent of any wavelength of radiation for seeing through or detecting emission from the surface of an envelope. In other words, if a second optical reader was used in Verschuur to read the inserted document data as the Examiner seems to suggest, the technological aspect of

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Verschuur of reading through an envelope to acquire information concealed from view would be unachievable. The entire teaching of Verschuur is related to utilizing a transducer to measure changes in capacitance (such as that produced by conductive inks on an inserted document) to acquire concealed information from a sealed envelope, which is distinguishable from using a second optical reading device to optically read document data on an inserted document and appearing through a window. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data separate from address data, and reading document data in order to determine whether a matching association exists between the package data and document data.

Independent claim 23 is directed to a system for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. An optical reader is adapted to optically read printed package data on a closed face package, the closed face package containing a document and including a window through which the document is visible, and the optical reader is adapted to optically read printed document data on the document and appearing through the window in the package. This optical reader allows for optical reading of the package data,

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that is distinct from the address data, and document data on the document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 23 also recites a storage medium containing a data file that includes account information specific to a mail recipient, the data file corresponding to the package data, the data file further corresponding to the document data which pertains to material and/or information contained inside the closed face package, and the data file further corresponding to address data printed on the package. Claim 23 further recites an electronic processing apparatus adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. It is additionally noted that the present subject matter does not contemplate using

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the external data file to effect a comparison between address data (a data set separate and apart from the package data) and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 23. Specifically, and further to the distinctions highlighted in the previously filed Amendments A and B, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, an optical reading device that optically reads printed package data, that is distinct from the address data, on a closed face package and printed document data on an inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a storage medium containing a data file that includes account information specific to a mail recipient, the data file corresponding to the package data, the document data, and address data; accessing of the data file and retrieving data forming a part of the account information; or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data.

As noted above, the two sections of the disclosure of Labarthe cited by the Examiner (column 7, lines 30-36 and lines 63-67) actually describe a first reader capable of reading a payee's address (either printed on the outside of the envelope or visible through an envelope window), and there is no disclosure

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in Labarthe of optically reading package data, that is distinct from the address data, and insert document data for matching of the data with an external data file for envelope processing. Additionally, while Verschuur does mention reading data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The entire teaching of Verschuur is related to utilizing a transducer to measure changes in capacitance (such as that produced by conductive inks on an inserted document) to acquire concealed information from a sealed envelope. If an optical reader was used in Verschuur to read the inserted document data, as the Examiner seems to suggest, the technological aspect of Verschuur of reading through an envelope to acquire information concealed from view would be unachievable. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data, that is distinct from the address data, and document data in order to determine whether a matching association exists between the package data and document data.

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Independent claim 30 is directed to a mailpiece processing system. Claim 30 recites that an optical reader is adapted to optically read printed package data on a closed face package, the closed face package containing a document inserted by a mail inserting device and including a window through which the document is visible, and the optical reader is adapted to optically read printed document data on the inserted document and appearing through a window in the package. This optical reader allows for optical reading of the package data, that is distinct from the address data, and document data on the inserted document and is designed for reading of the document data itself and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 30 further recites a storage medium containing a data file including account information specific to a mail recipient, the data file corresponding to the package data, the data file further corresponding to the document data which pertains to material and/or information contained inside the closed face package, and the data file further corresponding to address data printed on the package. Claim 30 additionally recites an electronic processing apparatus adapted to access the data file and retrieve data forming a part of the account information and to compare at least a portion of the data forming a part of the account information with the package data and to compare at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. Therefore, rather than the package data

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and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the document data is utilized and the account information is compared with both the package data and the document data to determine whether a matching association exists between the package data and the document data. It is additionally noted that the present subject matter does not contemplate using the external data file to effect a comparison between address data (a data set separate and distinct from the package data) and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 30. Specifically, and further to the distinctions highlighted in the previously filed Amendments A and B, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, an optical reading device that optically reads printed package data on a closed face package, that is distinct from the address data, and printed document data on an inserted document. Additionally, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a storage medium containing a data file including account information specific to a mail recipient, the data file corresponding to the package data, the document data, and address data; accessing of the data file and retrieving data forming a part of the account information; or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a



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portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data.

As noted above, the two sections of the disclosure of Labarthe cited by the Examiner (column 7, lines 30-36 and lines 63-67) actually describe a first reader capable of reading a payee's address (either printed on the outside of the envelope or visible through an envelope window) and there is no disclosure in Labarthe of optically reading package data, that is distinct from the address data, and insert document data for matching of the data with an external data file for envelope processing. Additionally, while Verschuur does teach reading data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The entire teaching of Verschuur is related to utilizing a transducer to measure changes in capacitance (such as that produced by conductive inks on an inserted document) to acquire concealed information from a sealed envelope, which is in direct contrast to using a optical reader to optically read document data on an inserted document and appearing through a window as described in the present subject matter. In other words, if an optical reader was used in Verschuur to read the inserted document data, as the Examiner seems to suggest, the technological aspect of Verschuur of reading through an envelope to acquire

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information concealed from view would be unachievable. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data, that is distinct from the address data, and document data in order to determine whether a matching association exists between the package data and document data.

Independent claim 37 is directed to a computer program product adapted for verifying a correct association between information printed on a closed face package and material and/or information contained inside the package. The package data printed on the closed face package and the document data printed on an inserted document and appearing through a window of the package are optically read by first and second optical reading devices, respectively. The first and second optical readers allow for optical reading of the package and inserted document and are designed for reading of the package data, that is distinct from the address data, and document data and not for merely detecting the presence of or number of inserted documents. As presently amended, claim 37 is also directed to reading a data file to access account information stored therein, the data file corresponding to the package data, the data file further corresponding to the document data which pertains to

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material and/or information contained inside the closed face package, and the data file further corresponding to address data printed on the package. Claim 37 further recites comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. Rather than the package data and document data being compared directly to one another for content verification, an external data file with account information corresponding to the package data and the separate document data is utilized and the account information is compared with the package data and the document data to determine whether a matching association exists between the package data and the document data.

Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the elements of amended independent claim 37. Specifically, and further to the distinctions noted in the previously filed Amendments A and B, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, receiving package data, that is distinct from the address data, and document data, the package data and document data being optically read by first and second reading devices, respectively, off of the package and inserted document, respectively. Additionally, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: reading a data file to access account information stored therein, the data file corresponding to the package data, the

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document data, and address data; or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data.

As noted above, the two sections of the disclosure of Labarthe cited by the Examiner (column 7, lines 30-36 and lines 63-67) actually describe a first reader capable of reading a payee's address (either printed on the outside of the envelope or visible through an envelope window) and there is no disclosure in Labarthe of optically reading package data (separate and apart from address data) and insert document data for matching of the data with an external data file for envelope processing. Additionally, Verschuur does teach reading data on the outside of an envelope using a conventional optical reader (similar to that in Labarthe), but a comparison of this information with identifying information acquired from the envelope contents still requires use of its transducer as described above rather than resulting from an optical reading. The entire teaching of Verschuur is related to utilizing a transducer to measure changes in capacitance (such as that produced by conductive inks on an inserted document) to acquire concealed information from a sealed envelope, which is in direct contrast to using a optical reader to optically read document data on an inserted document and appearing through an open or translucent window as described in the present subject matter. In other words, if an optical

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reader was used in Verschuur to read the inserted document data, as the Examiner seems to suggest, the technological aspect of Verschuur of reading through an envelope to acquire information concealed from view would be unachievable. Furthermore, the comparison made between the envelope address data and insert data according to Verschuur is a direct comparison of the two data sets that may allow for further processing of the envelope depending on the outcome of that direct comparison and does not involve the reading of an external data file and comparison of account information from that data file to package data, that is distinct from the address data, and document data in order to determine whether a matching association exists between the package data and document data.

Regarding independent claims 46-49, which correspond essentially to claims 1, 23, 30 and 37, respectively, but all recite “insert material” and “insert data” instead of “material and/or information and document data”, respectively, these claims have been amended similar to claims 1, 23, 30 and 37 above. As such, the arguments presented above in relation to claims 1, 23, 30 and 37 apply equally to claims 46-49, respectively.

Applicant respectfully submits therefore that Labarthe and Verschuur, either in combination or alone, fail to render obvious claims 1-15, 20, 21, 23-28, 37-39, 41, 43, 44, and 46-49.

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B. Labarthe and Verschuur in view of Robinson

Claims 16-18 and 39-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Robinson. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Robinson as set forth in the first and second Official Actions.

Applicant notes that Robinson merely teaches a manually operated mail sorting station for sorting pieces of unsorted mail into numerous bins in a case for holding sorted mail. The sorting station includes a scanner that reads an address printed on the pieces of unsorted mail and communicates through an interface to a computer that stores the address in memory. The sorter includes detectors attached to non-matching bins that may send back an error signal over the connection between the case and the computer in the event they sense that the unsorted mail has been placed in a non-matching bin, wherein the error signal may sound an alarm, display an error message, or the like.

The manual mail sorting station disclosed in Robinson is designed solely for use with manual sorting of rejected letters to assigned delivery mapping schemes (delivery bins) and is not related to indirectly verifying that the enclosed contents of a mailpiece or other enclosure correctly match information printed on the mailpiece. Additionally and as discussed above, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, a number of features of the presently claimed subject matter. Specifically, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the use of

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reading devices for optically reading printed package data on a package, that is distinct from the address data, and printed document data on an inserted document within and visible on the outside of the package (i.e., not concealed). Furthermore, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a data file to access account information stored therein, the data file corresponding to the package data, the document data, and address data; reading of the data file to access the account information stored therein; or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. The addition of Robinson fails to overcome the significant shortcomings of Labarthe combined with Verschuur described above. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art manual mail sorting station taught by Robinson, renders obvious claims 16-18 and 39-41.

C. Labarthe and Verschuur in view of Eisener et al.

Claims 19, 22, 42, and 45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Eisener et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Eisener et al. as set forth in the first and second Official Actions.

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Eisener et al. teach an envelope feeding assembly for feeding of and printing on envelopes while the envelopes are in motion. This envelope feeding and printing assembly consists of a system as known in the prior envelope feeding art and has all of the disadvantages associated with prior envelope feeding systems wherein the enclosed contents of the envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, a number of features of the presently claimed subject matter. Specifically, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, the use of reading devices for optically reading printed package data on a package, that is distinct from the address data, and printed document data on an inserted document within and visible on the outside of the package (i.e., not concealed). Furthermore, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a data file to access account information stored therein, the data file corresponding to the package data, the document data, and address data; reading of the data file to access the account information stored therein; or comparing at least a portion of the accessed account information with the package data and comparing at least a portion of the accessed account information with the document data to determine whether a matching association exists between the package data and the document data. The addition of Eisener et al. fails to overcome the significant shortcomings of



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Labarthe combined with Verschuur described above. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art envelope feeding and printing assembly taught by Eisener et al., renders obvious claims 19, 22, 42, and 45.

D. Labarthe and Verschuur in view of Wells et al.

Claims 30-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Labarthe/Verschuur in view of Wells et al. The Examiner has maintained the rejections based on Labarthe/Verschuur in view of Wells et al. as set forth in the first and second Official Actions.

Wells et al. teach an automated electronic verification system operative at the point of creation of a mail piece to enhance customer tracking of mail pieces and other data exchange functions between the Postal service, mass mailers and their customers. Wells et al. is directed to verification of address information and postage value in order to enhance the revenue protection of the postal service and does not address the problems associated with prior art inserters and verifiers wherein the enclosed contents of an envelope cannot be correctly verified with the printed address or other information on the outside of the envelope. Additionally and as discussed above, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, a number of features of the presently claimed subject matter. Specifically, Labarthe and Verschuur fail to teach or suggest, either alone or in combination, an optical reading device

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that optically reads printed package data on a package, that is distinct from the address data, and printed document data on an inserted document within and visible on the outside of the package (i.e., not concealed). Furthermore, Labarthe and Verschuur fail to teach or suggest, either alone or in combination: providing a storage medium containing a data file including account information specific to a mail recipient, the data file corresponding to the package data, the document data, and address data; the accessing of the data file and retrieving data forming a part of the account information; or comparing at least a portion of the data forming a part of the account information with the package data and comparing at least a portion of the data forming a part of the account information with the document data to determine whether a matching association exists between the package data and the document data. The addition of Wells et al. fails to overcome the significant shortcomings of Labarthe combined with Verschuur described above. Applicant respectfully submits therefore that no combination of Labarthe and Verschuur, even in combination with the prior art postage value verifier taught by Wells et al., renders obvious claims 30-35.

In light of the above amendments and remarks, Applicant respectfully submits that the cited references, either alone or in combination, fail to render obvious claims 1-5, 7-28, 30-35, and 37-49, and Applicant submits that the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn and that the claims should be deemed allowable at this time.

### III. New Claims

New claims 50-51 have been added by the present amendment as set forth above. Each of the new claims recite that package data and document data are optically read; account information is accessed from a data file where the data file corresponds to the package data, the document data, and address data; and a comparison occurs of the account information with the package data and the document data to determine whether a matching association exists between the package data and the document data. New claims 50-51 are considered patentable over the cited patents, as the cited patents, either alone or in combination, fail to teach or suggest all of the features listed above, specifically the accessing of account information from a data file and comparison of account information from that data file to package data distinct from address data, and reading document data in order to determine whether a matching association exists between the package data and document data. No new matter has been added.

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CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above amendments and remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

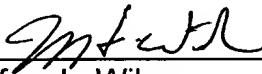
The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON & TAYLOR, P.A.

Date: November 9, 2005

By:

  
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